

resources they have committed to working on health reform initiatives in collaboration.” *Id.* at 2. Both of these important considerations are more than general, system-level concerns. The scope and nature of the business the applicant proposes would relate directly to financial interests of several VAHHS members. In addition to financial interests, GMSC would enter into a market already serviced by VAHHS members. VAHHS’s request thus identifies substantial and direct impacts to VAHHS’s members sufficient to justify interested party status.

VAHHS’s request more precisely sets out its interests and relevance as an interested party in connection with the CON criteria. Rule 4.000, § 4.406(2). In particular, VAHHS and its member organizations, consisting of the overwhelming majority of surgery providers in Vermont, are uniquely situated to intervene on questions of whether there is “an identifiable, existing, or reasonably anticipated need for the proposed project,” and whether “the project will improve the quality of health care in the state or provide greater access to health care for Vermont’s residents.” Rule § 4.406(2). VAHHS is also an engaged and invested participant in comprehensive state health reform initiatives, Motion at 4, and its commitment to these efforts underscores the relationship between the proposed project and VAHHS’s request to intervene. GMCB Rule 4.000, § 4.402(3)(d). Accordingly, VAHHS has demonstrated how relevant CON criteria relate to the request to intervene.

Last, the Board recognizes that Northwestern Medical Center (Northwestern) is a member organization of VAHHS, and has petitioned for and been granted by separate order issued today, interested party status to this proceeding. While Northwestern and VAHHS share some common interests, VAHHS represents the broader interests and perspectives of fifteen other member hospitals. Motion at 1. Among other differences, VAHHS can furnish the nonduplicative perspective of the implications of the proposed project across the hospital system.

Based on the above, the Board grants VAHHS’s motion for interested party status in this docket. VAHHS shall be copied by all parties on all materials entered into the record and materials submitted by VAHHS shall be admitted into record and copied to all parties. Finally, if VAHHS intends to submit any proposed questions for the Board to consider posing to the applicant, it must do so on or before September 4, 2015.

Dated: August 13, 2015
Montpelier, Vermont

GREEN MOUNTAIN CARE BOARD

By: /s/ Alfred Gobeille
Alfred Gobeille, Chair